

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:)	CHAPTER 7
)	
ERIN ENERGY CORPORATION, <i>et al.</i> ,)	Case No. 18-32106
)	
Debtors.)	(Jointly Administered) ¹
)	

**NOTICE OF CORRECTION TO TRUSTEE'S MOTION TO AUTHORIZE PAYMENTS
ON ACCOUNT OF DIP OBLIGATIONS, ALLOWED ADMINISTRATIVE EXPENSES,
AND THE ADEQUATE PROTECTION CLAIM ASSERTED BY PUBLIC
INVESTMENT CORPORATION SOC. LTD.**

PLEASE TAKE NOTICE that on November 10, 2023, the Trustee filed the *Trustee's Motion to Authorize Payments on Account of DIP Obligations, Allowed Administrative Expenses, and the Adequate Protection Claim Asserted by Public Investment Corporation Soc. Ltd.* [ECF No. 656] (the "Payment Motion").

PLEASE TAKE FURTHER NOTICE that paragraph 7 of Payment Motion incorrectly indicated the amount of the Chapter 7 Administrative Expense of Kasowitz Benson Torres LLP ("KBT") previously allowed.

PLEASE TAKE FURTHER NOTICE that KBT's Chapter 7 Administrative Expense previously finally allowed by order of the Court [ECF No. 630] is \$806,917.82.²

PLEASE TAKE FURTHER NOTICE that a corrected chart contained in paragraph 27 of the Payment Motion is as follows, with the corrections indicated in ***bold-italic*** font:

¹ The jointly administered cases are Erin Energy Corporation (Case No. 18-32106), Erin Energy Ltd. (Case No. 18-32107), and Erin Petroleum Nigeria Limited (Case No. 18-32108). At the commencement of the chapter 7 cases, the case of Erin Energy Kenya Limited (Case No. 18-32108) was also jointly administered with the other Erin debtors by the Trustee. The Erin Energy Kenya Limited case was closed on December 17, 2021.

² The "Total Award" in the order finally allowing KBT's compensation and reimbursement of expenses refers to the iterative compensation and reimbursement finally allowed for the period from November 1, 2018, through and including October 24, 2019. In addition to that amount, the \$349,789.04 previously allowed on an interim basis was allowed on a final basis.

<i>Dkt.</i>	<i>Claimant</i>	<i>Amount</i>
524	Moyes & Co. (Special Financial Advisor to the Trustee)	\$62,310.00
525	Stout Risius Ross, LLC (Financial Advisor to the Trustee)	\$91,795.75
527	Diamond McCarthy LLP (Former Attorney to the Trustee)	\$244,734.10
630	Kasowitz Benson Torres LLP (Former Attorney to the Trustee)	\$806,917.82
651	William G. West, P.C. (Accountant to the Trustee)	\$44,679.50
	TOTAL:	\$1,250,437.17

Dated: November 20, 2023.

Respectfully submitted,

SHANNON & LEE LLP

/s/R. J. Shannon
 Kyung S. Lee
 State Bar No. 12128400
klee@shannonleellp.com
 R. J. Shannon
 State Bar No. 24108062
rshannon@shannonleellp.com
 2100 Travis Street, STE 1525
 Houston, Texas 77002
 Tel. (713) 714-5770

*General Bankruptcy Counsel to Ronald J.
 Sommers, Chapter 7 Trustee*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served (a) at the time of filing, by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive such service and (b) within one business day of the filing, on the parties on the attached service list by U.S.P.S. first class mail.

/s/R. J. Shannon

R. J. Shannon

U.S.P.S. SERVICE LIST

Baker Botts LLP
Attorneys at Law
910 Louisiana Street
Suite 3000
Houston, TX 77002

NYSE
5660 New Northside Dr. NW
3rd Floor
Atlanta, GA 30328

Travel & More
7011 Harwin Drive
Suite 185
Houston, TX 77036

The Love Law Group
4008 Chartres St
Houston, TX 77004

John Michael
Stinson
6509 Edloe
Houston, TX 77055

Mindshift Technologies Inc
500 Commack Road
Suite 140
Commack, NY 11725

Ipreo Data, Inc.
1359 Broadway 2nd Floor
New York, NY 10018

Natural Resources Global Capital
Partner
29 Farm Street
London, England
UNITED KINGDOM W1J 5RL

Jackson Walker LLP
2323 Ross Avenue
Suite 600
Dallas, TX 75201

Pannell Kerr Forster of Texas, PC
5847 San Felipe, Suite 2600
Houston, TX 77057-3000

Workiva Inc
2900 University Blvd
Ames, IA 50010

Dudu Hlatshwayo
127 Greyvill Street
Kyalami Estates
Midrand
SOUTH AFRICA

Looper Goodwine, PC
1300 Post Oak Blvd
Suite 1250
Houston, TX 77489

Renmark Financial Communications
Inc.
1050-3400 De Maisonneuve West
West Montreal, Quebec
CANADA H3Z 3B8

Norton Rose Fulbright US, LLP
98 San Jacinto Boulevard
Suite 1100
Austin, TX 78701-4255

P2ES Holdings LLC
1670 Broadway, Suite 2800
Denver, CO 80202

Earl W. McNeil
Consultant
1606 Cambridge Oaks Circle
Houston, TX 77094

Broadridge ICS
300 Executive Drive
Edgewood, NY 11717

Canaccord Genuity Limited
88 Wood Street
London, England
UNITED KINGDOM EC2V 7QR

Johannesburg Stock Exchange
Private Bag X991174
Sandton, 2146
SOUTH AFRICA